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15 *Plaintiffs' Co-Lead Class Counsel*

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

18 AARON SENNE, et al., Individually and on  
Behalf of All Those Similarly Situated,

19 Plaintiffs,

20 vs.

21 OFFICE OF THE COMMISSIONER OF  
BASEBALL, an unincorporated association  
22 doing business as MAJOR LEAGUE  
BASEBALL, et al.,

23 Defendants.

CASE NO. 3:14-cv-00608-JCS  
(consolidated with No. 3:14-cv-03289-JCS)  
Assigned to: Hon. Joseph C. Spero

**CLASS ACTION**

**STIPULATION AND [PROPOSED]  
ORDER REGARDING PROCEDURE  
FOR DEPOSITION DESIGNATIONS**

1 WHEREAS, the parties have met and conferred regarding the procedures for exchanging  
 2 deposition designations as set forth in Section T of the Court's Superseding Case Management and  
 3 Pretrial Order (ECF No. 843).

4 WHEREAS, as a result of those discussions the parties have agreed to modify the  
 5 procedure for exchanging initial designations as set forth in this stipulation, and believe this  
 6 modification will make designations clearer and more convenient.

7 The parties stipulate and agree as follows, subject to court approval:

- 8 1. Plaintiffs' initial deposition designations shall be denoted with green highlights;
- 9 2. Defendants' initial deposition designations shall be denoted with purple highlights;
- 10 3. The parties are not required to line through portions of designated pages that are  
 11 not designated; and
- 12 4. This stipulation does not otherwise modify the timing or procedure for deposition  
 13 designations.

14  
 15 DATED: April 10, 2022

Respectfully submitted,

16  
 17 /s/ Bobby Pouya  
 PEARSON, SIMON & WARSHAW LLP

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1 DATED: April 10, 2022

/s/ Elise M. Bloom  
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**FILER'S ATTESTATION**

I, Bobby Pouya, am the ECF user whose identification and password are being used to file this document, hereby attest that the counsel listed above concur in this filing. I will maintain an executed copy of this pleading in our files that can be made available for inspection upon request.

Dated: April 10, 2022

/s/ Bobby Pouya  
Bobby Pouya

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**[PROPOSED] ORDER**

The Court having considered the parties stipulation and for cause appearing, IT IS  
HEREBY ORDERED that Section T of the Court's Superseding Case Management and Pretrial  
Order (ECF No. 843) is amended as follows:

1. Plaintiffs' initial deposition designations shall be denoted with green highlights;
2. Defendants' initial deposition designations shall be denoted with purple highlights;
3. The parties are not required to line through portions of designated pages that are  
not designated; and
4. This order does not otherwise modify the timing or procedure for deposition  
designations.

**SO ORDERED.**

DATED:

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HONORABLE JOSEPH C. SPERO